

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

Telecommunications Relay Services and	)	
Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	CG Docket No. 03-123
	)	
Americans with Disabilities Act of 1990	)	

**AT&T 2007 ANNUAL REPORT ON TRS WAIVERS**

Pursuant to the Commission's *Second Report and Order* in the above-captioned proceeding,<sup>1</sup> AT&T Inc. ("AT&T") submits this annual report on its progress in providing certain features and functions for Internet Protocol Relay ("IP Relay") and Video Relay Service ("VRS") that are subject to Commission waivers for Telecommunications Relay Services ("TRS").<sup>2</sup>

**Automatic Transfer of Emergency Calls to PSAPs**

Over the past year, AT&T, along with several other providers of Internet Relay and Video Relay Services, have come together in an attempt to discuss and address the issue of *Automatic Transfer of Emergency Calls to PSAPs* with the goal of collectively reaching a consensus on an industry wide solution for handling of these types of calls. Several providers have offered solutions that include, but are not limited to, priority

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<sup>1</sup> See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities: American with Disabilities Act of 1990*, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking, CC Docket No. 98-67 and CG Docket No. 03-123, FCC 03-112 (rel. June 17, 2003) ("*Second Report and Order*").

<sup>2</sup> On December 29, 2006, AT&T Inc. closed on its merger with BellSouth Corp. The resulting company is now known as AT&T Inc. In this report, unless otherwise noted, "AT&T" refers both to the merged company and its predecessors.

routing,<sup>3</sup> registration of users that is tied to a telephone address or other identifying information,<sup>4</sup> and use of a neutral 3<sup>rd</sup> party centralized database that would link an IP address or Instant Messenger (“IM”) identification to an address or location information which would then facilitate the process of providing a callback number to a PSAP.<sup>5</sup> In addition, other organizations such as the National Emergency Number Association (“NENA”) have filed their own recommended proposal for how to best handle these types of requests.<sup>6</sup>

While AT&T firmly believes that it is of utmost importance that users of these Internet-based relay services have the capability to request a call to an emergency number and have the confidence that the call will be processed effectively and efficiently, the reality is that the only way this will happen consistently is if every provider agrees to use the same process. Unfortunately, the industry has not yet reached consensus on how to effectively, consistently, and efficiently process these calls. In addition, AT&T believes that in order to reach a viable 911 solution, the industry must first address the issue of providing Internet-based relay users with a seamless and universal numbering scheme. It would be counterproductive to require providers of Internet-based relay services to develop a solution for processing of 911 calls before resolving the numbering issue else providers run the risk and additional cost of retrofitting the numbering solution into the processing of 911 calls.

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<sup>3</sup> See Comments of Sorenson Communications, March 13, 2007.

<sup>4</sup> See Comments of CSD, February 28, 2007.

<sup>5</sup> See Comments of Sprint, March 27, 2007.

<sup>6</sup> See Comments of NENA, March 27, 2007.

Accordingly, absent an industry wide consensus or an official FCC order for how the numbering solution will be addressed, AT&T is not yet prepared to commit financial or technical resources to developing a solution for processing automatic transfer of emergency calls to PSAPs. However, AT&T commits to continue working cooperatively and collaboratively with industry providers and other professional organizations to reach a viable solution that can be implemented consistently regardless of the provider used by the caller. In the meantime, AT&T continues to support IP relay and VRS users who request calls to emergency numbers by requesting the caller to provide their physical address or location and then conducting a query in an emergency database in order to determine the most appropriate PSAP location. Any and all information that is available from the caller will be relayed from the relay operator to the PSAP.

AT&T urges the Commission to extend the waiver until such time that an industry wide consensus is reached and/or the Commission resolves its pending Access to Emergency Services proceeding.<sup>7</sup>

### **Pay-Per-Call Services**

Similar to the ability to effectively process 911 calls to PSAPs, call completion to 900 and other *Pay-per-call Services* requires the Automatic Number Identification (“ANI”) of the IP Relay or VRS user be known and available to the relay provider in order to be able to bill the call. The technical limitations of securing ANI for Internet-based relay users continue to exist and will not allow providers to complete these calls on a Sent Paid basis. Moreover, the only manner in which these types of calls could be completed would be if the pay-per-call service provider allowed the user to bill the call to

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<sup>7</sup> Access to Emergency Services, Notice of Proposed Rulemaking, CG 03-123, FCC 05-196 (November 30, 2005).

a credit card or a debit card. Unfortunately, an IP or VRS relay provider has no way of knowing what types of billing are permitted by the pay-per-call service provider. In addition, demand for these types of calls has declined considerably for traditional relay users and the general public. AT&T urges the Commission to either extend the waiver or issue an order that permanently waives these types of calls via Internet.

### **VCO, STS, and HCO or Voice Initiated Calls to Internet-based Relay Users**

In its waiver report filed in April 2006, AT&T mentioned that some success has been made in the ability to transmit voice or sound via the Internet for use with relay calls. However, AT&T can only claim limited success under the most ideal situations found in its lab environment where control can be exercised on variables that can impede the quality of the transmission such as customer premise equipment, voice cards, type of Internet connection, etc. Until these same ideal situations become widely and readily available for all Internet-based relay users, the quality of voice-based IP or VRS calls cannot be assured by AT&T. For this reason, AT&T urges the Commission to continue waiving the requirement for handling one line VCO, HCO, STS or other voice-enhanced relay services. However, AT&T would be remiss if it did not mention or acknowledge the fact that 2 line VCO or HCO continues to be provided via its IP relay or VRS. These types of calls do not present the same technical limitations as one-line.

### **Carrier of Choice (Equal Access to Interexchange Carriers and Operator Assisted Calls)**

AT&T submits to the Commission that there is currently no compelling reason for seeking a solution that would allow users of Internet-based relay services to have their call billed by their carrier of choice or preferred interexchange carrier because there is

currently no cost for completing any relay call that originate via the Internet. The reason there is no cost for these calls is because jurisdiction of the call cannot be determined without reliable ANI or other permanent location information. Moreover, users currently have their choice of more than eight IP relay and VRS providers.

Additionally, since there is currently no cost for processing Internet-based relay calls, there is no need for a caller to request operator assisted calls (collect, bill-to-third, calling card, etc.) which are considered premium types of calls that incur surcharges.

This situation could potentially change if the Commission were to require registration with authentication. Until such time as ANI or location information becomes available, IP and VRS calls will continue to be completed at no cost which would render the need for carrier of choice or operator assisted calls as irrelevant or unnecessary. For this reason, AT&T urges the Commission to permanently waive these requirements for IP and VRS calls.

### **Call Release**

This feature would allow the relay operator to release a call originated by a Internet-based relay user and subsequently terminate to another text user after first going through a voice caller. The prevailing technical limitations that would allow this type of call to be processed continue to exist and AT&T has been unsuccessful in developing a technical solution that will allow this feature to be implemented via Internet Relay or Video Relay as contemplated by the Commission.

## CONCLUSION

In light of the existing significant technological barriers described above, good cause exists for the Commission to continue in force the current waivers for the call types/features discussed above.

Respectfully submitted,

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